

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

)
Retail Access Optimization Initiative) Docket No. N2011-1

DIRECT TESTIMONY
OF MAX HEATH, NNA T-1
ON BEHALF OF NATIONAL NEWSPAPER ASSOCIATION
(September 16, 2011)

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1 Introduction

2 My name is Max Heath. I am officially retired as vice president of Landmark
3 Community Newspapers, Inc., but I continue to consult with newspapers, including
4 LCNI. In my 45-year career in the community newspaper industry, I have been a
5 working reporter, sports editor, news editor, editor and general manager. In corporate
6 staff work from 1980-2008, I was VP/executive editor for 21 years, VP/circulation and
7 postal for 23 years, and an acquisitions executive as well for my final seven years. My
8 company had 56 community weekly, multi-weekly and daily newspapers, most in the
9 mails for both Periodicals newspapers and Standard Mail shoppers or specialty
10 publications. We also operated seven college sports magazines, mailed Periodicals and
11 First-Class for expedited delivery.

12 I remain very active as the chairman of National Newspaper Association's Postal
13 Committee, where I have served since 1986. I have been one of NNA's Mailers
14 Technical Advisory Committee representatives since 1989, and served on numerous
15 Periodical workgroups. NNA represents 2,300 members, which includes community
16 weekly and small daily newspapers. In that capacity I write a monthly column for the
17 NNA's *Publishers' Auxiliary*, provide seminars on postal issues and circulation around
18 the country, and operate a hotline for newspapers to report trouble with delivery and
19 postal rules. The goal of our hotline is to work with USPS to trouble-shoot delivery
20 problems by helping the Postal Service correct problems in the delivery network and
21 advising newspapers in how to prepare their mail for best results. We helped USPS
22 pioneer more cost-effective Flats Trays for optional Periodicals newspaper use since
23 late 2005.

24 I have appeared before the Commission as an expert witness for newspapers in
25 omnibus rate case Dockets R97-1, R2000-1, R2004-1 and R2006-1 and the Time-
26 Warner complaint case, C2004-1. I also was a witness for NNA in the 6- to 5-Day
27 Street Delivery case, N2010-1. As the Commission is aware from previous dockets,
28 NNA is a small organization with few resources for systematic data-gathering. However,
29 because of the breadth of my consulting practice, and my length of service for the
30 industry in postal issues, I believe I generally have a good grasp of the issues arising in

1 the industry and the Postal Service's likely or potential responses to them, and how they
2 affect members.

3 My purpose in this testimony is to identify areas where the closing of post offices
4 is likely to impair the ability of newspapers to reach their readers. I also have
5 recommendations to the Commission and the Postal Service on the gathering and
6 response to customer input when a post office is on the list for discontinuance or
7 consolidation.

8 Small community newspapers typically depend entirely upon the Postal Service
9 to deliver issues to readers. NNA faces frequent misunderstandings about the nature of
10 our newspapers, given the shrinkage of the metropolitan newspapers in recent years.
11 Our membership numbers indicate that new newspapers are being started, and though
12 some are being closed, overall our industry remains reasonable steady. The negative
13 impacts we face are mostly from the general economic malaise in the nation, not from
14 digital competition. As stated in the recent Federal Communications Commission
15 report, "Information Needs of Communities, The Changing Media Landscape in a
16 Broadband Age,"¹ our local journalism remains key to well-being of local communities.
17 NNA considers the Postal Service's duty to deliver those newspapers a part of the
18 universal service obligation, anchored in part by the statutory requirement for universal
19 service and in part by more than 200 years of tradition. In fact, when Congress charged
20 the Postal Service with 'binding the nation together,' newspapers were an integral part
21 of that mission. They remain so today and must be served, despite the Service's
22 financial troubles.

23 At the outset of my testimony, I want to make it clear to the Commission that
24 NNA is not categorically opposed to the closing of post offices in areas where services
25 can be provided more efficiently and at least equally effectively by nearby offices.
26 Operating in and around rural America for most of my life, it is clear to me that USPS
27 has operated offices past their time—including in places where nothing else is going on
28 in the town but the post office. But, as in its choices for downsizing its distribution

¹ Information Needs of Communities, The Changing Media Landscape in a Broadband Age, Federal Communications Commission (June 9,2011), found at <http://www.fcc.gov/info-needs-communities>.

1 network, USPS must choose its moves strategically and wisely. The size of a post
2 office is not necessarily the best indicator of its importance. And it is not sufficient for
3 USPS to simply decide that its rural service mandate is no longer achievable because of
4 chronic cost overruns in its networks. A balance must be struck. In my testimony, I
5 make several specific recommendations that will help newspapers avoid damage from
6 the Postal Service's discontinuance and merger plans.

7 **I. Small post offices are essential to the Postal Service's newspaper delivery**
8 **mission in many cases.**

9 NNA's appearances before the Commission have often had at their core mission
10 to highlight the continuing importance of community newspapers to small town and rural
11 America. Although our membership also comprises many urban and suburban
12 newspapers, it is the smaller communities that are most often in the line of fire for
13 Washington policies.

14 **A. There are many small newspapers using USPS delivery services.**
15

16 **1. Awareness of the size and importance of community**
17 **newspapers is critical to setting sound postal policy**

18 In an urban area like Washington, D.C, it may be hard for the Postal Service to
19 imagine that there are community newspapers serving some pretty small communities.
20 In less densely populated areas in the Plains or Inter-Mountain communities, for
21 example, viable communities of fewer than 1,000 people have existed for many years.
22 Sometimes the town once was larger, but a mining operation closed, or a US highway
23 fell into disuse after the Interstate highway opened. Sometimes the community was
24 founded by settlers in the post-Civil War period and never was very large. But many
25 more of them survive than most people would imagine unless they have traveled widely
26 in those regions. And then, of course, there are rugged or inaccessible terrains like the
27 island towns, mountain areas, much of Alaska, and small towns in Hawaii. All of these
28 have recognition from Congress as part of rural America. The Postal Service has a
29 special obligation to serve rural areas.

1 Many of those communities have their own local newspapers, usually a weekly
2 publication. Within NNA's membership, for example, we have daily newspapers with
3 circulations as small as the Rocky Ford (CO) Daily Gazette, Daily, circ. 1963 or the
4 Concordia (KS) Blade-Empire, Daily, circ.2313 and weekly newspapers with circulations
5 even smaller, like The County Democrat, circulation 143, in Shawnee, OK; the
6 Clearwater Progress, circulation 340 in Kamiah, ID, the Pulse, circulation 392, in Hart,
7 TX, and the Bryant Dakotan, circulation 402, in Bryant, SD. NNA's typical daily
8 newspaper member is about 10,000 in circulation, and a typical weekly is about 5,000
9 in circulation. Many of our "weeklies" are actually published twice or three times a week.

10 In a typical community newspaper, circulations break down roughly as 75-80
11 percent delivery within the county, 10-15 percent to smaller towns around the entry
12 county, and 5-10 percent to distant subscribers, such as snow birds or former residents.
13 For a newspaper that sits close to a county line, these numbers may be dramatically
14 different, as a market area may span two counties. I will address these three groupings
15 as the "in-county," the "surrounding counties" and the "distant" readers. For the in-
16 county readers, the office of original entry is the primary destination office in most
17 cases. For the adjoining county and distant readers, the original entry office feeds into
18 the USPS processing network, unless the newspaper is able to drop-ship those latter
19 categories directly at a Sectional Center Facility.

20 **2. The in-county recipients may be at risk.**

21 The post offices in the target list of 3,652 named in this docket are not typically
22 serving as original entry offices for our in-county readers. However, that is not uniformly
23 the case.

24 The publisher of the Jefferson County Leader weekly newspaper in Festus, MO,
25 has already contacted us with concern. The pending closure of Fletcher, MO, 63030
26 post office which is in Jefferson County means that newspaper will have to mail those
27 in-county copies through Richwoods, MO, in neighboring Washington County. Publisher
28 Pat Martin is concerned his legitimate in-county copies in Fletcher will become outside-
29 county copies via entry in an outside-county ZIP. There is also confusion as to whether
30 the Fletcher ZIP code will be eliminated. Martin had understood that ZIP codes wouldn't

1 be eliminated even if offices closed, just served via other offices. There may be other
2 newspapers affected by the list in this docket from which NNA has not yet had contact.

3 The implications of this problem are grave indeed.

4 First, it puts the newspaper's core readership at risk. Those in-county copies that
5 previously have been relatively safe from service problems are now at risk of traveling
6 many miles before they return home. If the delivery typical of the surrounding-counties
7 delivery infects these in-county readers, a newspaper's future will be dim. The ability of
8 NNA to help these newspapers keep that origin/destination office working to hold copies
9 out of the processing network is the key element in keeping community newspapers
10 alive.

11 Second, and equally gravely, if future closings leave a newspaper without an in-
12 county original entry office, a challenge to that newspaper's eligibility as a "within-
13 county" product/price user is possible.

14 Over the years, the Postal Service has interpreted the mandate of Congress to
15 maintain a subclass (now product) equivalent to old sections 4358 (a) and (c) to fit
16 changes in publishing. For example, the consolidation of printing facilities has meant
17 most community newspapers no longer maintain a printing plant in their own operation,
18 but hire that work from company specializing in printing that may be outside the county.
19 USPS has interpreted the in-county rules to identify a newspaper with an office in the
20 county where mail is entered. That has been sufficient to the challenge of change in our
21 own industry.

22 But what does it mean if USPS closes down all of the offices in the "in-county"
23 area? We are not sure, frankly. It is not comforting that the Postal Service has not
24 seemed to anticipate this issue.

25 We believe and hope that the legal counsel of the Service can address this
26 problem by interpreting a county broadly to signify the county where the newspaper is
27 published (meaning its offices are there), even if the delivery routes originate in another
28 county. Newspapers should not suffer the loss of eligibility for this mail subclass or

1 product simply because the post office moves. I recommend that the Commission
2 examine this issue and concur in NNA's recommendation that USPS should issue legal
3 guidance forthwith that protects these small newspapers from eligibility loss.

4 **3. On-time delivery will suffer if exceptional dispatch offices are lost.**

5 Within the past 20 years, the Postal Service's changed distribution systems have
6 caused the surrounding-county copies to become a delivery challenge. They are as
7 critical to the newspaper's success as the within-county copies because residents in
8 those smaller communities typically are shopping in the newspaper's main market area.
9 So publishers must treat them with the same degree of care as they treat in-county
10 copies.

11 If those copies are entered at a local office, they may already travel 30-50 miles
12 to a Sectional Center Facility for processing before returning to the market area. I use
13 the word "processing" here deliberately rather than "sorting" because postal software
14 commonly in use handles the sorting through labeling databases, but USPS still has to
15 combine our sorted newspapers with other mail.

16 For these surrounding county readers, most NNA newspapers have had to adapt
17 by performing more of our own version of drop-shipping, called exceptional dispatch for
18 time-sensitive Periodicals, under the provisions of DMM 707.28.3.

19 Exceptional dispatch is authorized by the postmaster in the original entry office.
20 It permits the publisher to pay postage there, but to drop the bundles at the publisher's
21 own cost at smaller offices serving surrounding counties and sometime even distant
22 copies. Typically, this drop-ship is a simple act of leaving a bundle on a postal dock or
23 in a lobby overnight. The mail is obviously sorted to the 5 digit office, and mostly also to
24 the carrier route, and sequenced for delivery, earning Delivery-Unit prices. That office
25 may not be open at the time of the drop, and in today's economy, most likely is not
26 open. But the postmasters or contract officers in charge know how to handle that mail.
27 Any difficulties with postage payment, verification or preparation are taken up with the
28 larger entry office, as needed.

1 The future of these surrounding-county copies is perilous as more of the smaller
2 CAG J-L offices close down.

3 But the future need not be so bleak. USPS has the power to protect its
4 newspaper mail by requiring the replacement service provider to provide the exceptional
5 dispatch drop. Here is what I mean by that statement.

6 USPS has stated its intention to open retail offices in lieu of many small post
7 offices. It also has, today, many offices operated under contract. USPS Witness Boldt
8 has referred to these as Village Post Offices (VPOs) and Contract Postal Units (CPUs).
9 The relevant element of these two categories is that delivery routes typically do not
10 originate from them, but box service is available.

11 In both cases, it appears, USPS intends to continue box service. In both cases,
12 USPS controls by contract the services those offices provide.

13 NNA has already encountered a problem with serving the customers in a CPU.
14 For example, our member in Wright, Wyoming, recently encountered a new issue when
15 the Postal Service said it would no longer allow PO Box copies to be left by the mailer in
16 the CPU that serves most of the newspaper's circulation area. Since 2005, with NNA's
17 help, the newspaper had adapted to that problem by entering the mail formally in
18 Gillette, WY, where it paid postage, but leaving those important PO Box copies in
19 Wright the day of entry using exceptional dispatch. That kept newspaper local delivery
20 alive. The contractor was happy to provide this service, as the CPU is in the same
21 building, just down the hall in fact, from the newspaper.

22 Fortunately for NNA, the wise action of the Gillette postmaster and district office,
23 in consultation with USPS Headquarters Business Mail Acceptance has so far
24 reinstated the CPU's service. Such exceptional dispatch drops at a CPU save costs of
25 driving the copies 45 miles to Gillette and back by the paper, and USPS hauling the
26 copies 45 miles back. It reduces USPS handling, and the copy count is easily verifiable.
27 But I note USPS says in its testimony that CPUs will no longer accept exceptional
28 dispatch copies. VPOs, evidently, will not be asked to do so either. This plan must be
29 changed to allow for newspaper drops.

1

2 **4. The Postal Service must re-examine its analytical tools when closing**
3 **post offices.**

4 It is surprising to me, as a prior witness in PRC cases where questions about
5 counting within-county revenues and volumes have been pervasive, to learn from the
6 Postal Service's written testimony that commercial mailer revenues are not being
7 examined in the discontinuation analysis.

8 I can think of no reason why the Postal Service would wish to disregard the
9 revenues from newspaper Periodicals or Standard mailers, or those of other businesses
10 in a community that use a local post office.

11 It is not unusual for a local newspaper to use a post office as its entry location. In
12 fact, although some newspapers in our membership enter their mail in formally-
13 constituted Business Mail Acceptance Units, by far the greater practice is to enter mail
14 and pay for it at the local post office. Though USPS may not recognize that revenue as
15 belonging to that post office, it certainly has the tools now through *Postal One!* and its
16 revenue accounting systems to identify revenues being entered at each office. Having
17 tried to persuade USPS for many years to tie its volume totals from offices not yet
18 computerized to its more reliable revenue accounts, I have a high degree of faith that
19 the Service knows how much revenue comes into the local offices from our newspaper
20 members.

21 It is conceivable that the Service is making the assumption that when offices
22 close, the mailer will slide smoothly into a new entry office. I can assure both the
23 Commission and the Postal Service that this expectation is unrealistic. The loss of a
24 local entry office would be enough to force many publishers out of the mail.

25 **5. In some cases, better service and equal efficiency might be achieved by**
26 **creating a "circuit-rider" postmaster.**

27 I have observed many cases where a full service small post office may not be
28 needed. In this respect, NNA agrees with the Postal Service that the time has come

1 when supporting these offices with a postmaster, staff and regular business hour-
2 operation is no longer feasible. The Village Post Office is a concept that deserves a
3 chance, provided it is set up correctly.

4 But I am not as convinced that every small post office on the closing list should
5 be replaced solely with the Village Post Office concept. In some cases, the real need is
6 to reduce the human resource cost. In small communities, rent is cheap and utilities are
7 an insignificant part of the USPS total budget.

8 Noting that only \$200 million will be saved if every office on the candidate list is
9 closed, it seems to me this category of very small offices is a good laboratory for trying
10 another concept.

11 I recommend, therefore, that the Postal Service consider a "circuit-rider"
12 postmaster who can oversee several offices within a reasonable driving distance, rather
13 than closing these offices entirely. Contract clerks could conduct business as usual, at
14 a lower cost than today, and a professionally-trained USPS employee postmaster could
15 oversee that work.

16 I believe, in fact, that this concept is being used in some places today, even if it is
17 not conceptualized as I have stated it.

18 The value of the "circuit-rider" is in keeping a knowledgeable USPS-trained
19 individual in charge while cutting labor cost at the front counter of the operation. If such
20 a practice were adopted, a full-service office that continues to offer USPS's unique
21 values to the business community could be maintained, and cost-cutting goals could still
22 be reached. I hope the Commission will examine this idea in making its
23 recommendations.

II. NNA recommends corrections in the current analysis and practice when a small post office is under inquiry, and possible stay of the closings until service standards are examined.

A. NNA's recommendations:

Most of NNA's concerns about these closings can be addressed without much financial impact upon the Postal Service, at least with regard to the offices targeted in this docket. As larger post offices are put under the microscope, it will be critical to maintaining the Postal Service's cash flows from our mailing community for corrections to be made.

1. Revenue from bulk business mail accounts tied to a local post office must be counted on an equal basis with stamp or package sales.
2. Where a newspaper enters all or most of its mail distribution, a heavy presumption on keeping an office open should prevail. Many of those newspapers also have large Standard Mail carrier rate shoppers that pay revenues from two to six times larger than Periodical revenue.
3. Where a newspaper original entry OR an exceptional dispatch location is on target for discontinuance or merger, USPS should prefer a CPU to a VPO, because the range of services to be provided is wider. CPUs should be required by contract to provide exceptional dispatch drop service.
4. In every case where box sections are provided—whether a CPU or a VPO—exceptional dispatch must be allowed for purposes of serving box section patrons to give timely delivery to them, and the newspapers serving them. With the Draconian plant closings being proposed, newspapers traveling relatively short distances to the SCF and back could now travel hundreds of miles to a hub plant before returning to the delivery locality.
5. The Commission should recommend that the Postal Service immediately issue a legal opinion that newspapers' within-county rate eligibility will in no

1 case be denied because of the Postal Service's decision to close all post
2 offices within a county.

3 6. A "circuit-rider" postmaster concept should be considered for some small
4 offices, in lieu of closing them entirely and replacing them with a VPO or CPU.

5 NNA member newspapers are long accustomed to taking on new costs and
6 inconveniences as the mailing network changes. These costs are real, and they put the
7 newspapers at an economic disadvantage. But to help the Postal Service overcome the
8 financial challenges that gave rise to this docket, NNA is ready to assist our industry in
9 finding workable solutions, provided timely delivery can still be provided.

10 **B. Post Office closings cannot be viewed in isolation of service standards.**

11 NNA understands that major proposed changes in service standards are ahead
12 and that the Commission will soon open a docket to consider these proposed changes.

13 It is difficult to assess the degree of business disruption that may occur to
14 community newspapers from post office closings without a thorough understanding of
15 the intentions of the Service for providing on-time delivery.

16 This docket, N2011-1, therefore, may be premature. Ideally, the Commission
17 would be able to resolve the service standards questions ahead before making final
18 commentary on the closings of post offices. However, the urgency of the Postal
19 Service's financial situation may preclude holding the record in this docket open until
20 service standards are resolved. Because the limited number of post offices on the
21 discontinuance list here, the potential damage may be reasonably contained. But as
22 larger offices come into the scope of closing, the concerns about delivery will intensify.

23 I am unable to make a recommendation at this time on how the closures and the
24 pending standards changes can be harmonized. I must state for this record, however,
25 that the Postal Service must maintain at least overnight delivery for our in-county and
26 surrounding-county newspaper issues dropped at the delivery office. In cases where an
27 exceptional dispatch places bundles in a carrier's line of delivery and the appropriate

1 verifications are handled at a further-away entry office, same-day delivery should
2 remain possible.

3 If the Postal Service proposes ending either of those two service expectations,
4 NNA's objections will be vigorous and continuous. Whatever the changes ahead, NNA
5 is willing to work with the Service to adapt our mail to the changing network. But if the
6 changes are done without consideration for keeping our newspapers in business, NNA
7 will take its case to all available audiences. We can help keep the Postal Service in
8 business, but we will not sacrifice our own newspaper businesses to do so. I am
9 pleased to have an opportunity in this docket to make this declaration, and I hope the
10 Commission will lend its strong advisory voice to our concerns.

11 **C. Community input must be open and transparent and the purpose of**
12 **seeking such input should be clearly stated.**

13 The Postal Service has directed its district offices to oversee the community input
14 necessary prior to a closing. Although this docket was only recently opened, some NNA
15 members have already had a taste of the type of community input being sought in some
16 communities: none.

17 People will not trust what they cannot see. As a lifelong journalist, I have lived by
18 this principle. The Postal Service is a cherished public institution that has long enjoyed
19 the support of the American public even when every other institution in Washington
20 seemingly has lost much public trust.

21 The poor handling of the community input phase of these proceedings puts the
22 institution's reputation at risk, and with it the reputations of those who rely upon it for
23 delivery.

24 As Postal Committee chairman, I have received some comments from publishers
25 who have participated in these public meetings. Clearly, some of these community
26 discussions are being handled well. Some are not being handled well.

27 Here is an excerpt of an email I received earlier this month, with the names of the
28 postal employees deleted:

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"Brad Gentry, publisher of the Houston (Mo.) Herald, attended a meeting Aug. 31, at the schoolhouse in Success, Mo., where postal officials met with about 40 local residents who were notified by mail of the event. A community organizer asked that someone from the newspaper be present. xxx, manager of post office operations, xxx, Mo., and yyy,, Mo., postmistress, discussed possible plans to close the Success postal facility. For the most part, xxx conducted the meeting.

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Gentry said the first order of business by the postal officials was to announce that no audio, video or still photographs would be allowed, or the postal officials would immediately close the meeting and leave.

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State Rep. Don Wells (R-Cabool), who was attending the meeting on behalf of U.S. Sen. Roy Blunt, was using a tape recorder and was told to stop and also erase the tape. Rep. Wells asked the postal officials under what authority was audio recording prohibited. He was told, "We will email you a copy of that."

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Gentry said the postal officials, when asked questions by the audience, consulted pages of a Q&A script they had brought to the meeting. Members of the crowd were well-behaved, Gentry said, as they gave postal officials several reasons why closing the Success post office would be detrimental to businesses and residents of the community.

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As the last question was asked, Gentry said he snapped a photograph of those at the meeting. A moment later, a man approached Gentry and identified himself as a U.S. Postal Inspector, and Gentry was asked to step outside into a hallway.

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Gentry said, "He (the postal inspector) was very nice, but I told him to not allow the local newspaper to make a photograph of the meeting is not right. Fifty years from now when researchers want to know how rural post offices were shut down, they will turn to newspaper archives for the story."

31

32

33

Curious to know how others were experiencing this community dialogue, NNA surveyed newspapers across the country using its own membership list, and asking for assistance from state level newspaper organizations to reach out to our non-members.

1 The results of that discussion are attached here as Appendix A, with all the comments
2 that were provided included.

3 Clearly, USPS Headquarters is using a very light hand in directing transparency
4 in these meetings, when a much more directive approach is needed.

5 NNA believes the Commission should recommend several new elements in its
6 policy on how community input should be handled.

7 First, if community input cannot alter the outcome of the discontinuance or
8 merger, residents should be told so at the outset.

9 Second, if there are criteria that must be met to determine a discontinuance or
10 merger, or conversely that would dictate that the office remain open, the residents
11 should be informed in advance of any community survey or meeting what those criteria
12 are.

13 Third, community meetings should be held in every instance unless natural
14 disaster prevents a meeting or the complete absence of a residential population can be
15 demonstrated.

16 Fourth, the Postal Service should approach the notification of those meetings
17 with some modicum of the zeal it uses to promote its flat rate boxes. USPS is now, I am
18 proud to say, an organization that knows how to promote itself. It should use those skills
19 to genuinely solicit public input. A press release, a paid public notice in the local
20 newspaper and announcement on a local radio station, if there is one, should be used,
21 and the announcement should be no less than 30 days prior to the event.

22 Fifth, it should be obvious that a community meeting held when most residents
23 are at work will be displayed to the community as occurring at the convenience of the
24 postal staff, not for the service of the residents. Meetings should be in the evenings or
25 on weekends.

1 Finally, the Postal Service should collect a roster of those attending, including
2 news organizations, and announce the outcome of the proceeding to all when the final
3 decision is made.

4 I do not address here the steps USPS should take to make sure sufficient postal
5 services are available prior to a discontinuance, but I would note that USPS can create
6 a self-fulfilling prophecy of a failing post office if it makes postal transactions difficult.

7 **Conclusion**

8 NNA's purpose in this docket is not to oppose the closings or mergers of post
9 offices. We agree that with the current financial straits of the Postal Service, action
10 must be taken to eliminate unneeded retail and mailer locations. However, these
11 closings and mergers must be chosen strategically and palliative solutions must be in
12 place to avoid harm to communities and small businesses like community newspapers.
13 Closures that cause potential deterioration in newspaper delivery demonstrate that the
14 community has a legitimate need for that post office. When a closure or merger is
15 necessary, the Postal Service has a full range of tools at its disposal to keep local
16 newspaper copies within a local zone for delivery, and it must work harder to mandate
17 at the national level that those tools should be used. Finally, when a closure or merger
18 is likely, community input should be given a fair chance in an open, transparent meeting
19 to make the case for keeping the office open.

1

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Appendix A

3

NNA asked the following question about post office closings. (The question is repeated midway through the response tally for graphic reasons. The responses are continuous. Responders were permitted to check more than one answer.

6

Following the tally is a list of comments provided voluntarily by responders. The comments are copied verbatim.

7

Postal policy encourages, but does not require, a community meeting prior to a closing. It does require a questionnaire sent to postal patrons in advance. If you have witnessed any part of this process in recent months, NNA would like some feedback on how well it worked. If you have not witnessed a closing yet, please skip to the next question.

	answered question	133
	skipped question	339
	Response Percent	Response Count
There was no meeting.	51.9%	69
There was a meeting, but during most people's workday.	7.5%	10
There was a meeting, but notice occurred only on a poster at the post office.	10.5%	14

Postal policy encourages, but does not require, a community meeting prior to a closing. It does require a questionnaire sent to postal patrons in advance. If you have witnessed any part of this process in recent months, NNA would like some feedback on how well it worked. If you have not witnessed a closing yet, please skip to the next question.

There was a meeting, but no press announcement was made.	21.1%	28
There was a meeting, but press were not admitted.	0.8%	1
There was a meeting, but photography or recordings were barred.	2.3%	3
There was a meeting, but it clearly was to tell people what was going on, not to ask for input.	31.6%	42
There was a meeting, but it was poorly handled.	12.0%	16

1

2 **Comments**

3 One post office that we drop-ship to has all rural delivery going to a larger post office 10
4 miles north. We are now forced to drive our papers there. There has already been a
5 problem with drop ship to new location.

6 9/14/2011 7:05 PM

7

8 The meeting was very well handled

9 9/14/2011 5:53 PM

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11 In the case of one post office, it was closed without a public hearing. The reason cited
12 was an "emergency suspension." Residents had only four days' notice to make other
13 arrangements.

1 9/14/2011 5:47 PM

2
3 I attended a meeting for the closing of the Grant, IA post office. Recorded and took a
4 few pictures; other press was there also. Officials from the P.O. were there, and tried to
5 explain why they were closing the office down and also alternatives such as other
6 towns delivering the customers mail to their mail boxes - each person to erect a
7 mailbox at the entry to their property. It will now be closing for sure October 1. Another
8 town, Lewis, IA has had a meeting, but our newspaper was not informed about it.

9 9/14/2011 4:52 PM

10
11 There will be a meeting shortly and a press announcement was made in advance of the
12 meeting.

13 9/14/2011 3:09 PM

14
15 No meetings or questionnaires yet. We are watching for this

16 9/14/2011 2:48 PM

17
18 There was a meeting, publicized by the local postal union workers and correspondingly
19 covered by the media. I attended the meeting, offered insight into our particular
20 situation (reliance on postal distribution facility as primary drop plocation for newspaper
21 distribution) and was given promises of alteranative plans. Since that hearing those
22 plans have not been forthcoming, in spite of efforts to get details from contacts with the
23 regional postal operation.

24 9/14/2011 12:45 AM

25
26 If there has been a meeting, my newspaper was NOT notified. I would like to be notified
27 of ANY and ALL meetings.

28 9/14/2011 12:19 AM

29
30 There was a publicized meeting with Congressional representatives in attendance. It
31 was Pollock, MO - Don't think there have been any meetings at the other 3 PO's in our
32 locality.

33 9/14/2011 11:37 AM

34
35 local postmasters have been awesome.

36 9/14/2011 10:38 AM

37
38 not sure there was a meeting or any notice

39 9/14/2011 9:38 AM

40
41 There was a meeting when they tried to close Chester and a large group of residents
42 showed but so far there have been no announcements of meetings of the Post Offices
43 on the list.

44 9/14/2011 9:35 AM

1
2 I have not witnessed any part of that process.

3 9/14/2011 9:08 AM
4

5 I have gone to several of these over the last few years, most recently in Keswick, Iowa.
6 The 2 postal workers who were leading this meeting were rude and laughed often as if
7 it were not important or even funny. They were cold and the questions asked were not
8 answered well and many were answered in a way to lead the questioner to believe they
9 didn't matter. Best quote when an elderly man asked why he would have to go to a
10 town in another county and school district and was further away, the USPS gal said
11 "County line and district lines mean nothing to the post office."

12 9/14/2011 8:52 AM
13

14 NA

15 9/13/2011 10:14 PM
16

17 It was also not held in that community, but about 14 miles away in Enid.

18 9/13/2011 8:04 PM
19

20 New information to me. I didn't know they were suppose to do this.

21 9/13/2011 6:10 PM
22

23 I am not aware of a meeting, but it is possible that one happened.

24 9/13/2011 5:37 PM
25

26 This is a comment based on a meeting a few years ago when addresses in this area
27 were changed based on state... if you lived in Minnesota you got a Minnesota address
28 even if that post office was miles from you, same for Iowa. We are a border town so we
29 have many roads that wind back and forth among the two states.

30 9/13/2011 5:37 PM
31

32 Unsure

33 9/13/2011 5:16 PM
34

35 no announcements made of any meetings.

36 9/13/2011 4:18 PM
37

38 We've had one post office close however not sure if there was a meeting.

39 9/13/2011 4:13 PM
40

41 There is a meeting coming up

42 9/13/2011 3:39 PM
43

1 The Eldora Post Office where we exceptional dispatch, switched sorting centers to
2 Grundy Center an additional 25 miles from Eldora. We enter approximately 3,000
3 pieces of our TMC at that Post Office but we were given no notice of the change. Our
4 post office personnel at the local level have been very helpful however, they too
5 received little or late notice of the changes. We are unaware of any meeting.
6 Technically the post office is still open however, they no longer accept bulk mailing.

7 9/13/2011 3:37 PM

8
9 We were only told ONE DAY in advance of not being able to exceptional dispatch one
10 of our weekly publications.

11 9/13/2011 2:14 PM

12
13 One of the recent closings was in Cambridge IL where we have the Cambridge
14 Chronicle. The production for this paper is done at our Geneseo, IL location. If there
15 was a meeting about the closing of Cambridge, it was not brought to my attention as
16 the circulation person that one was held. I was caught by surprise. Most of the closings
17 I had been made aware of where much smaller offices than this one in the county seat.

18 9/13/2011 12:45 AM

19
20 Meeting at 3 p.m. with public input and media allowed.

21 9/13/2011 12:28 AM

22
23 We experienced closures in Covington, Fletcher, and Lewistown, Ohio. We were
24 notified of the closure, but to my knowledge there wasn't a community-wide meeting
25 held. As Group Publisher I did not receive an invitation to such meeting, if it was held.

26 9/13/2011 11:57 AM

27
28 There was no meeting that our newspaper was made aware of. We did publish a news
29 item related to the closings.

30 9/13/2011 11:56 AM

31
32 Meeting was well attended by residents, but PO officials, while they did take questions,
33 skewed their replies to the fact that the PO in question was not generating revenue and
34 it is all about the money. PO officials kept saying that the local PO was being considered
35 for closure because the PM had retired. Local people replied with the answer that the
36 job was posted only for a few days.

37 9/13/2011 11:56 AM

38
39 Don't know if there was a meeting; we weren't notified.

40 9/13/2011 11:41 AM

41
42 NA

43 9/13/2011 11:33 AM

1 Questions and concerns were not addressed

2 9/13/2011 11:19 AM

3
4 Not aware of a meeting

5 9/13/2011 10:51 AM

6
7 We learned of it ahead of time and wrote an article. Otherwise, no one would have
8 known about it except a few post office patrons.

9 9/13/2011 10:20 AM

10
11 Have not heard that the Lamar office is planning to close as yet

12 9/13/2011 10:20 AM

13
14 Meeting scheduled- notice sent to newspaper.

15 9/13/2011 9:43 AM

16
17 I'm unaware of any meeting

18 9/13/2011 9:29 AM

19
20 Meeting has not yet been scheduled to our knowledge

21 9/13/2011 9:09 AM

22
23 news article: Residents upset about possible closure of post office in Crane By Bill
24 Vander Weele Sidney Herald Crane resident Chris Knutson wonders how she will
25 receive the medications for her husband in the future. Now when the insulin arrives, the
26 Crane postal worker gives her a call to pick it up. The Crane Post Office is targeted for
27 closure. The U.S. Postal Service announced in January its plan to close about 5,000
28 small, rural offices in the nation. Offices currently being reviewed in Montana are in
29 Crane, Cardwell, Shawmut and Redstone. What am I going to do in 30 below weather
30 and we need medications? Knutson said. There were a lot of times this winter I didn't
31 go to town because of the weather. Lisa Blomquist, manager of consumer affairs for the
32 U.S. Postal Service in Montana, says within the next month the proposal will be posted
33 at the post offices in Crane and Sidney. The proposal will explain the possibility of the
34 Crane office closing because of a limited work load. Residents have 60 days to
35 comment on the proposal. The national office will then review those comments and
36 make a final decision. Once the final decision is posted, residents have another 60
37 days to comment. Residents Dave Harris and Bonnie Litten agree the post office is vital
38 to the small town residents. Harris says the most important component the post office
39 offers is the picking up and delivering of packages. There are about 45 box holders.
40 People get their meds here, you can't always get out in the winter, he said. But another
41 part of the post office is its community importance. the communications center for our
42 community, Harris said, noting how people look at the bulletin board for news. our
43 information center. all we have to tell this community. We don have a gas station or
44 coffee shop. Litten added, We wouldn't know anybody here if it wasn't for the post

1 office.Harris says often residents leave their surplus of vegetables in the building entry
2 way so others can enjoy them. They don'tt call the neighbors and say we have some
3 vegetables because everybody is busy working Harris said. One community meeting
4 has already been held considering the matter. On the building counter are
5 questionnaires from the U.S. Postal Service as well as a letter from U.S. Sen. Jon
6 Tester. The senator writes that he has held discussions with national and state leaders
7 about the subject. I'm really disappointed they are even thinking of closing it, Knutson
8 said. It's going to affect people with limited income and people with disabilities. Knutson
9 said many residents have offered to provide services such as mowing the lawn to help
10 reduce expenses. This is the stupidest time to close when we might really need it in a
11 year, Harris said, referring to the potential added residents because of the oil boom.
12 Residents have been urged to contact Tester, U.S. Sen. Max Baucus and U.S. Rep.
13 Denny Rehberg to express their desire to keep the post office open. It's been here for
14 100 years. I would hate to see it go away, Knutson said.

15 9/12/2011 11:19 PM

16
17 Cheraw downtown was scheduled to be closed. There was a notice and a meeting. It
18 was well publicized by radio and newspaper. The community attended. Former Rep.
19 John Spratt (6th Dist) intervened and saved the post office from closing.

20 9/12/2011 6:19 PM

21
22 There was a meeting regarding proposed closing of Muldoon, TX, post office. It was
23 handled well and we covered it in the newspaper. Why does your questionnaire not
24 have a box for a positive response. This does not give me confidence in the survey
25 methodology.,9/12/2011 6:17 PM

26
27 When the meeting was announced, it was as if the proposed closing were a "done
28 deal." Weeks later, the next list didn't even have the first post office as a prospect for
29 closing. And these are itty-bitty places that need to close. A county of 37,765 people
30 does not need nine post offices, and we certainly don't need three within a 5 to 10-mile
31 radius.

32 9/12/2011 6:12 PM

33
34 no meeting yet

35 9/12/2011 6:10 PM

36
37 I am not aware of such meetings or surveys

38 9/12/2011 6:07 PM

39
40 Don't know of any meeting at this point.

41 9/12/2011 6:02 PM

1 I learned of the meeting at a small post office in our county from a patron. I did cover
2 the meeting and the people who attended were very upset with the postal service. Most
3 people left feeling that there was nothing they could do to stop it.

4 9/12/2011 5:53 PM

6 The three meetings I attended or knew about were not publicized until I found out about
7 them myself. Postal patrons were informed by a personal note in their PO boxes ...
8 some of them on the very day of the meeting.

9 9/12/2011 5:35 PM

11 I know of no such meeting in my circulation area.

12 9/12/2011 5:29 PM

14 At the Halsey, NE meeting it seemed it had already been predetermined that the post
15 office would be closing. They were not looking for input.

16 9/12/2011 5:29 PM

18 Not aware of any meeting(s).

19 9/12/2011 5:24 PM

21 I was not there myself, but a representative for the newspaper reported that they were
22 unprepared for her questions and they didn't have any knowledge she was coming or
23 who she was. She just happened to be the liason from Sen. Tim Griffin's office.

24 9/12/2011 5:23 PM

26 havent heard of a meeting yet

27 9/12/2011 5:13 PM

29 Postal officials were clearly out of their element in a small community, and they were
30 unable to answer a considerable number of questions.

31 9/12/2011 5:10 PM

33 I have not heard anything about a meeting. If it was, it wasn't advertised with us.

34 9/12/2011 5:03 PM

36 There is a meeting scheduled in a couple of weeks for Ruskin, NE

37 9/12/2011 5:02 PM

39 There will be a meeting, but not yet scheduled

40 9/12/2011 5:01 PM

1 The message came across pretty plainly that the meeting was to discuss serving the
2 area "efficiently and effectively" with the closing of the PO. And frankly, the office had
3 7,000 in revenues last year and expenses of over 10,000 per year- it needs to close.

4 9/12/2011 4:57 PM

5
6 There is supposed to be a community meeting scheduled and the Postmaster has told
7 us that all postal patrons will receive a notice as well as newspaper in order to publicize
8 it.

9 9/12/2011 4:41 PM

10
11 We found out the day before from a resident. We sent a staffer to cover it.

12 9/12/2011 4:32 PM

13
14 At meetings that were well attended in Andrew and McCausland, Iowa, reporters said
15 Postal officials were equipped only to answer questions about how much money USPS
16 is losing and why change is necessary. They had no or very little data and were
17 unprepared to answer any questions about local operations. People were frustrated!

18 9/12/2011 4:31 PM

19
20 Not sure about public meetings at all ... haven't heard a word on any of that.

21 9/12/2011 4:28 PM

22
23 A meeting will be held on Sept. 22nd, with a representative from the USPS there.

24 9/12/2011 3:54 PM

25
26 we found out about the change two days before our paper was to be entered.

27 9/12/2011 3:39 PM

28
29 public meeting happened and much concern and unhappiness was displayed by
30 citizens at another post office no hearing!

31 9/12/2011 3:38 PM

32
33 I was allowed to attend and take pictures at the one location. I found out about the
34 meeting through our local post master.

35 9/12/2011 3:29 PM

36
37 I guess there was a meeting. Everyone says that they didn't know about it, the only two
38 people that showed were the postmaster and the mail carrier. The paper found out
39 because someone stopped by the day it was closing and said hey did you know that
40 there is a sign in the Parks post office today saying the post office is closing today?
41 Why didn't you do a story on it, none of us knew anything about it. Funny that the Post
42 Office says they sent letters because the last I heard no one had ever received them.
43 Maybe they got lost in the new sorting system since our local postmasters can no

1 longer put an envelope in the box here without having it sent to North Platte 120 miles
2 away or Grand Island 25 miles away to be sorted first. Funny that the postmaster said
3 she was told she'd lose her job if she told us about it. It was a farce. I don't think the
4 other town had a public meeting either. So that would be two meetings that I am not
5 aware of happening. We would have appealed one of the post offices had we known it
6 was going on.

7 9/12/2011 3:06 PM

8
9 USPS staff illegally would not let us shoot pictures in the Post Office.

10 9/12/2011 3:05 PM

11
12 The representative spoke out of both sides of his mouth... He was there to gather input
13 and no final decision had been made... but at the same time it was clear that the
14 wheels were in motion and not much was going to stop them.

15 9/12/2011 2:32 PM

16
17 I said there was not meeting, however, if there was, I was unaware of it. No residents in
18 our community were aware of it, if there was a meeting. There certainly was no meeting
19 when the decision was made to remove the local rural route carriers from our local post
20 office.

21 9/12/2011 2:32 PM

22
23 No meeting yet that I am aware of.

24 9/12/2011 2:30 PM

25
26 Two of the meetings we attended there was no recordings allow and he also lumped in
27 no photography, but we shot anyway.

28 9/12/2011 2:29 PM

29
30 Some meetings were held by the community to try to find a solution, but no official
31 USPS meeting has yet been scheduled.

32 9/12/2011 2:25 PM

33
34 There were meetings. Most of the community members attended. They were not
35 happy. We (the media) did attend and we DID report on the meetings!! These meetings
36 primarily were informational as to what was going to happen.

37 9/12/2011 2:23 PM

38
39 I got a letter and told where I had to go to drop off my papers with one week's notice!

40 9/12/2011 2:21 PM

41
42 We received notification from the postmaster by phone and publicized it in our paper.
43 We attended the meeting and both the USPS reps and the citizens attending were

1 courteous, but it seemed evident to all that the closing will happen regardless of citizen
2 input.

3 9/12/2011 2:21 PM
4

5 The Smoot, Wyoming Post Office closure meeting happened and no one in the
6 community even knew it was taking place. There was some soundbites about how
7 notice had been given. But ask area residents if they knew what was taking place and
8 they will say no. The Freedom Post Office has been battling closure for months. The
9 meeting was well attended, letters have been sent. Local and state officials have
10 appealed on behalf of the postal patrons. The post office is still scheduled to be closed
11 and area residents are extremely frustrated and feel they have not been heard by the
12 government.

13 9/12/2011 2:05 PM
14

15 The meetings haven't been scheduled yet so I can't tell you. I do plan to try to attend
16 the ones affecting the Dupuyer and Bynum post offices in my coverage area.

17 9/12/2011 2:00 PM
18

19 In one instance, where a post office has already been closed, no one seemed to know
20 about the meeting if there is one. Another post office likely to be closed did have a
21 meeting that we were aware of, so we have seen it go down in several ways so far.

22 9/12/2011 1:57 PM
23

24 There was a meeting. We received no notice from the USPS, but got the date and time
25 ourselves from USPS and published a notice. The meeting was well attended and
26 those in attendance were able to provide input.

27 9/12/2011 1:54 PM
28

29 There is a meeting scheduled, hasn't happened yet.

30 9/12/2011 1:41 PM
31

32 meetings are not the problem.

33 9/12/2011 1:32 PM
34
35
36
37
38
39
40